

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

J.Y.C.C., <i>et al.</i> ,)	
)	Case No. 4:15-cv-01704-RWS
Plaintiffs,)	
)	
vs.)	
)	
THE DOE RUN RESOURCES)	
CORPORATION, <i>et al.</i> ,)	
)	
Defendants.)	

**DEFENDANTS' NOTICE INFORMING THE COURT OF HOLDING SUBPOENA
DUCES TECUM AND POSTPONING DEPOSITION AND DOCUMENT PRODUCTION
IN IN RE: THE RENCO GROUP INC. AND THE DOE RUN RESOURCES
CORPORATION, CASE NO. 1:22-MC-21115 JAL (S.D. FLA.)**

COME NOW, Defendants The Doe Run Resources Corporation and The Renco Group ("Applicants" or "Defendants"), by and through undersigned counsel, and hereby file this Notice informing the Court that they are holding the subpoena duces tecum and indefinitely postponing Mr. Careaga's deposition and associated document production in *In Re: The Renco Group Inc. and the Doe Run Resources Corporation*, Case No. 1:22-mc-21115-JAL (S.D. Fla.), advising this Court of the following:

1. On June 8, 2022, the court in *In Re: The Renco Group Inc. and the Doe Run Resources Corporation* granted Applicants' *Ex Parte* Application for Authorization to Take Discovery Pursuant to 28 U.S.C. § 1782 from Respondent Victor Careaga (Dkt. No. 8).
2. On July 19, 2022, Mr. Careaga filed a notice of Objection to Applicants' Subpoena to Testify in a Civil Action, served on him on July 5, 2022 (Dkt. No. 10). *See* Exhibit 1. Specifically, Mr. Careaga requested that the subpoena be quashed, or alternatively, that the discovery be abated until this Court resolves Plaintiffs' pending Motion for Anti-Suit

Injunction to Prevent Frustration of Court's Protective Order of March 24, 2022 (Dkt. Nos. 671-72); Exhibit 1 at unnumbered 3-4.

3. On July 22, 2022, Defendants agreed to hold the subpoena duces tecum served on Mr. Careaga indefinitely and to postpone his deposition previously scheduled on August 3, 2022, and any associated document production, until further notice. *See* Exhibit 2.
4. Accordingly, Defendants advise the Court that they will not proceed with any discovery in that federal action or the referenced state court action (*DRRC, et al. v. Thaler, et al.*, Case No. 2022-007907 CA 15 (11th Judicial Cir.)) pending this Court's ruling on Plaintiffs' Motion for Anti-Suit Injunction.

Respectfully submitted this 22nd day of July, 2022.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 22nd day of July, 2022, a true and correct copy of the foregoing was filed with the Clerk of the Court through the Court's CM/ECF system, which will affect service on all counsel of record by sending a Notice of Electronic Filing.

/s/ Geoffrey M. Drake